

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

EMANUEL D. FAIR,

Plaintiff,

v.

KING COUNTY, a political subdivision of the  
State of Washington; et al.,

Defendants.

NO. 2:21-cv-01706-JHC

STIPULATED MOTION TO FILE  
EXHIBITS UNDER SEAL AND ORDER  
TO SEAL

The above-named Parties, by and through their respective counsel, jointly move this Court for an Order pursuant to Local Rule 5(g) to seal Exhibits 36a, 63, 64, 65, 67, and 69 to be filed with the Declaration of Rachel R. Tobias in Support of Plaintiff's Opposition in Response to All Defense Motions for Summary Judgment filed on April 21, 2025 (Dkt. # 211). This will also necessitate filing a redacted memorandum (Dkt. # 210), with the unredacted version filed under seal. The Parties hereby stipulate and agree as follows:

1. Pursuant to LCR 5(g)(3), counsel for Plaintiff hereby certifies that on April 21, 2025, they conferred with counsel for King County and City of Redmond, specifically, Carla Carlstrom and Salim Lewis, via email to reach agreement on the need to file the documents under

FAIR-2025-04-21 STIPULATED MOTION TO SEAL  
AND ORDER TO SEAL  
2:21-cv-01706-JHC - 1

seal, and to explore other alternatives to filing under seal such as redaction.

2. See Declaration of Rachel R. Tobias in Support of Stipulated Motion to File Exhibits Under Seal.

3. Defendant King County does not agree to retract its confidentiality designations for these exhibits as they contain material protected by attorney work-product privilege (Exs. 63, 64, 65, 67 and 69) or implicate victim privacy (Ex. 36a – crime scene photo of victim). *Id.*

4. By so stipulating, neither Plaintiff nor Defendants consent to discovery above or beyond those permitted by the Federal Rules of Civil Procedure or this Court’s Local Rules.

5. By so stipulating, Plaintiff does not waive the right to seek an order unsealing these documents at a future date.

DATED this 21<sup>st</sup> day of April, 2025.

GALANDA BROADMAN, PLLC

*s/ Rachel R. Tobias*

---

Ryan D. Dreveskracht, WSBA #42593  
Corinne Sebren, WSBA #58777  
Rachel R. Tobias, WSBA #34111  
Attorneys for Plaintiffs  
P.O. Box 15146 Seattle, WA 98115  
(206) 557-7509 Fax: (206) 299-7690  
Email: ryan@galandabroadman.com  
Email: corinne@galandabroadman.com  
Email: rtobias@galandabroadman.com

LEESA MANION (she/her)  
King County Prosecuting Attorney

*s/ Carla Carlstrom*

---

CARLA B. CARLSTROM, WSBA #27521  
KARISSA TAYLOR, WSBA #31563  
Senior Deputy Prosecuting Attorneys  
701 5<sup>th</sup> Avenue, Suite 600  
Seattle, WA 98104  
(206) 296-8820 / Fax (206) 296-0191  
carla.carlstrom@kingcounty.gov

karissa.taylor@kingcounty.gov  
Attorneys for Defendant King County

BAKER STERCHI COWDEN & RICE, LLC

*s/ Salim Lewis*

---

ROBERT L. CHRISTIE, WSBA #10895

SALIM D. LEWIS, WSBA #52660

Baker Sterchi Cowden & Rice, LLC

2100 Westlake Avenue N., Suite 206

Seattle, WA 98109

[bob.christie@bakersterchi.com](mailto:bob.christie@bakersterchi.com)

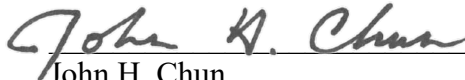
[salim.lewis@bakersterchi.com](mailto:salim.lewis@bakersterchi.com)

Attorneys for Defendants City of Redmond  
and Brian Coats

**ORDER**

Pursuant to the Stipulation above the Court hereby ORDERS that Plaintiff's Opposition in Response to All Defense Motions for Summary Judgment (Dkt. # 210) and exhibits 36a, 63, 64, 65, 67, 69 filed with the Declaration of Rachel R. Tobias in Support of Plaintiff's Opposition in Response to All Defense Motions for Summary Judgment (Dkt. # 211), are to be filed under seal.

DATED this 22nd day of April, 2025.

  
\_\_\_\_\_  
John H. Chun  
United States District Judge